



Gideon Orion Oliver

—ATTORNEY AT LAW—

He/him/his

277 Broadway, Suite 1501
New York, NY 10007

1825 Foster Avenue, Suite 1K
Brooklyn, NY 11230

Gideon@GideonLaw.com*

GideonLaw.com

Office: (718) 783-3682

Signal: (646) 263-3495

Fax: (646) 349-2914*

**Not for service*

July 1, 2025

BY ECF

Hon. Marcia M. Henry
United States Magistrate Judge
United State District Court
Eastern District of New York

Re: Adam White v. Sholem Klein, et al., 23-cv-06924 (RER)(MMH)

Your Honor::

I am co-counsel for Plaintiff Adam White. By way of background, in this matter, Plaintiff accepted offers of judgment pursuant to Fed.R.Civ.P. Rule 68, which resolved all of the claims in the case except those for attorney's fees, costs, and expenses. In a March 11, 2025 text-only order, the Court extended the deadline to file any application for attorney's fees, costs, and expenses until 60 days after the Clerk of the Court entered the judgments. The judgments were subsequently entered on March 12, 2025, making the deadline for any attorney's fees, costs, and expenses application May 12, 2025. On May 12, 2025, the Court granted a joint application by all parties (ECF 46) to extend that deadline to July 14, 2025.

I now write to ask that the Court extend the current July 14, 2025 deadline until September 29, 2025. Defendants join in this application.

The parties are engaging in good faith discussions to attempt to resolve Plaintiff's claims for attorney's fees, costs, and expenses. Those discussions are somewhat different, and in some ways more complicated, than those in the typical 1983 case against the City and NYPD members because there are both Defendants represented by the Law Department, as well as a private Defendant, represented by private counsel. Past that, counsel all have different dates in July and August when we will be on vacations and unavailable. If the Court grants this application for additional time to negotiate, the parties are hopeful that we can resolve these claims, without Court intervention - or, if not, at last narrow the issues for the Court to consider in a fee application (or settlement conference).

Thank you for the Court's attention to this matter.

Respectfully submitted,

/S/

Gideon Orion Oliver